## Aaron Richard Golub, Esquire, P.C. Lawyers

24 East 64th Street -5<sup>th</sup> Floor New York, New York 10065

212-838-4811 Facsimile 212-838-4860

February 13, 2023

## VIA ECF

The Honorable P. Kevin Castel United States Courthouse Courtroom 11D 500 Pearl Street New York, New York 10007

Re: Brian Donnelly AKA KAWS et al v. Jonathan Anand et al,

Civil Action No. 1:21-cv-09562 (PKC) (BCM)

Dear Judge Castel:

This office represents Plaintiffs in the above-captioned action. On January 17, 2023, the Court held the Case Management Conference (Dkt. 94 and Dkt. 104 for transcript.). The next Case Management Conference is scheduled for October 3, 2023 at 11:00 A.M.

Paragraph 14 of the Civil Case Management Plan and Scheduling Order (Dkt. 94), provides that Plaintiffs shall move for a default judgment against Defendants Dylan Jovan Leong Yi Zhi ("Leong"), The Penthouse Theory ("TPT"), and The Penthouse Collective ("TPC") (the "Defaulting Leong Defendants"), within 30 days, i.e. by this Thursday February 16, 2023. Plaintiff Brian Donnelly is out of the country with his family and is not expected back in his office until Monday February 20, 2023. As this office needs to consult with Plaintiff Mr. Donnelly in preparation for the default judgment motion, Plaintiffs respectfully request a one week extension to Thursday February 23, 2023, to file the motion for default judgment. This is Plaintiffs' first request for such extension.

Respectfully Submitted,

Nehemiah Glanc

Nehemiah S. Glanc

cc: via ECF to counsel and parties